

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for
Approval of 2013-2014 Statewide Marketing, Education
and Outreach Program and Budget. (U39M)

Application 12-08-007
(Filed August 2, 2012)

And Related Matters.

Application 12-08-008
Application 12-08-009
Application 12-08-010

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK
FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS 16-03-029 AND 16-04-039**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 16-03-029 and D.16-04-039
Claimed: \$12,368.92	Awarded: \$12,368.92
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Stephen C. Roscow

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>Decision 16-03-029 refines the Commission's program for energy management-related statewide marketing, education, and outreach (ME&O) to residential and small business customers. First, the Decision establishes a competitive solicitation process that will be used to select the entity that will implement and administer the program beginning in 2017. Second, the Decision adopts several modifications to the existing vision, goals and governance structure in order to provide guidance to the solicitation process. Third, the Decision orders a workshop to consider certain other aspects of the Statewide ME&O program after the release of the results of the two Commission-ordered evaluation, measurement, and verification studies related to the program.</p> <p>Decision 16-04-039 authorizes Southern California Gas Company (SoCalGas) to provide up to \$11 million of funding for additional ME&O activities in the Los Angeles</p>
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	<p>Basin (LA Basin) in 2016, for the purpose of reducing the risk of natural gas and electricity curtailments in the Los Angeles area this year. Of this funding, \$5 million will be used to support paid Flex Alert advertising by the California Independent System Operator, focused on customers in the Los Angeles area. SoCalGas is authorized to utilize up to an additional \$6 million to implement a targeted marketing, education, and engagement campaign. The Decision requires SoCalGas to establish a memorandum account to track all costs associated with the Flex Alert, marketing, education, and engagement activities approved in this Decision.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	April 16, 2015	Verified.
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	May 18, 2015	Verified.
4. Was the NOI timely filed?		Yes, The Utility Reform Network (TURN) timely filed the notice of intent to claim intervenor compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	See Comment #1	Verified.
6. Date of ALJ ruling:	See Comment #1	Verified.
7. Based on another CPUC determination (specify):	See Comment #1	Verified.
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, TURN demonstrated appropriate status.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001 and A.15-03-005	Verified.

10. Date of ALJ ruling:	September 5, 2014 and August 6, 2015	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, TURN demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-04-039	Verified.
14. Date of issuance of Final Order or Decision:	April 27, 2016	Verified.
15. File date of compensation request:	June 24, 2016	Verified.
16. Was the request for compensation timely?		Yes, TURN timely filed the request for intervenor compensation.

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
1	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding. As explained in the Commission's Intervenor Compensation guide, "normally, an ALJ Ruling needs not be issued unless: (a) the NOI has requested a finding of "significant financial hardship" under § 1802(g). (b) the NOI is deficient; or (c) the ALJ desires to provide guidance on specific issues of the NOI." (page 12) Since none of these factors apply to the NOI submitted in this proceeding, there was no need for an ALJ ruling in response to TURN's NOI.	Verified.

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. RFP Process/ Scoring Committee</p> <p>TURN acknowledged that the utilities have the experience and resources to lead the request for proposal (RFP) process but advocated for Commission staff be given primary control and oversight of the RFP process. TURN also recommended that staff should develop the RFP eligibility and evaluation criteria. The Commission adopted this position and determined that staff should play a central role in developing the RFP and making the ultimate decision on the winning bidder. TURN also emphasized the importance of having stakeholders (including the IOUs, RENs, CCAs, consumer advocates, social justice advocates, and other interested parties) participate in the RFP process, including evaluating bids and providing feedback to Commission staff. The Commission agreed and adopted an RFP process that allowed for stakeholders to meaningfully participate in the process. TURN also advocated for interested parties to be eligible for intervenor compensation for their participation in the RFP, which the Commission adopted.</p>	<ul style="list-style-type: none"> - TURN Opening Comments on the Amended Scoping Memo, November 20, 2015, p. 5. - TURN Reply Comments on the Amended Scoping Memo, December 11, 2015, p. 4. - D.16-03-029, pp. 21 & 76 COL #1. - TURN Opening Comments on the Amended Scoping Memo, November 20, 2015, p. 5. - TURN Reply Comments on the Amended Scoping Memo, December 11, 2015, p. 4. - D.16-03-029, pp. 21-23. - TURN Reply Comments on the Amended Scoping Memo, December 11, 2015, p. 4. - D.16-03-029, pp. 20 (FN 28), 22 & 76 COL #1. 	Verified.
<p>2. Goals & Vision</p> <p>TURN recommended that the Commission modify the schedule of the proceeding to include a workshop on the results of the</p>	<ul style="list-style-type: none"> - TURN Opening Comments on the Amended Scoping Memo, November 20, 	Verified.

<p>draft 2014-2015 Evaluation Report when it is released so the results can inform the RFP process and provide a forum for parties to discuss the results of the report. The Commission adopted this recommendation in order to “provide a forum to discuss parties’ recommendations in light of the EM&V results.” TURN proposed two roles for a statewide program: 1) giving customers information and direct links to utility and REN programs, 2) enable customers to directly take actions to reduce or manage their energy usage in other ways. The Commission adopted this dual role vision for the Statewide ME&O program. TURN advocated for changes to the existing program goals that were focused on reducing duplicative spending and ensuring that the Statewide ME&O program drives customers to action. Per TURN and other parties’ recommendations, the Commission revised the program’s long-term goal to be more focused on customer actions.</p>	<p>2015, pp. 1-2.</p> <p>- D.16-03-029, p. 25.</p> <p>- TURN Opening Comments on the Amended Scoping Memo, November 20, 2015, p. 2.</p> <p>- TURN Reply Comments on the Amended Scoping Memo, December 11, 2015, pp. 1-2.</p> <p>- D.16-03-029, pp. 35 & 79, OP #2.</p> <p>- TURN Opening Comments on the Amended Scoping Memo, November 20, 2015, p. 3.</p> <p>- TURN Reply Comments on the Amended Scoping Memo, December 11, 2015, p. 2.</p> <p>- D.16-03-029, p. 43.</p> <p>- TURN Opening Comments on the Amended Scoping Memo, November 20, 2015, pp. 3-4.</p> <p>- TURN Reply Comments on the Amended Scoping Memo, December 11, 2015, p. 1.</p> <p>- D.16-03-029, pp. 66 & 77, COL #8.</p>	<p>D.16-03-029 at. 33 & 79, OP #2.</p> <p>D.16-03-029 at 40.</p>
<p>3. 2017 and Beyond Structure & Budget</p> <p>Regarding the Statewide ME&O program structure, TURN advocated for more coordination and integration between the statewide and regional programs. The Commission adopted this recommendation and modified the current structure of the statewide ME&O program to be based upon an integrated planning process. TURN recommended waiting until after the RFP process to set the Statewide ME&O program budget because the Commission is still determining the general</p>	<p>- TURN Opening Comments on the Amended Scoping Memo, November 20, 2015, pp. 3-4.</p> <p>- TURN Reply Comments on the Amended Scoping Memo, December 11, 2015, p. 1.</p> <p>- D.16-03-029, pp. 66 & 77, COL #8.</p>	<p>Verified.</p>

<p>scope for statewide ME&O activities after 2016. TURN also noted that the current annual budget is likely an appropriate annual budget for the future statewide ME&O program. The Commission agreed with TURN and determined it was premature to set a budget before a program administrator is chosen and the evaluation results are reviewed. D.16-03-029 also gives the current annual budget as a minimum budget for RFP participants to base their proposals off of.</p>	<ul style="list-style-type: none"> - TURN Opening Comments on the Amended Scoping Memo, November 20, 2015, pp. 56. - D.16-03-029, pp. 71-71 & 76, FOF #10. - D.16-03-029, pp. 71 & 78, COL #9. 	<p>TURN Opening Comments on the Amended Scoping Memo, November 20, 2015 at 5-6.</p> <p>D.16-03-029 at 71-72 & 76, FOF #10.</p>
<p>4. Aliso Canyon (AC) Scope TURN supported additional targeted ME&O activities to address and reduce the risks of shortages. TURN recommended a focus on direct outreach to customers to encourage greater energy use management and reductions. The Commission adopted this approach. Due to the fact that potential shortages are most likely to occur in the summer, TURN recommended that the Commission direct SoCalGas to begin designing additional ME&O efforts for the affected communities as soon as possible and the Commission agreed. TURN also advocated for Commission oversight of SoCalGas' ME&O activities and an opportunity for stakeholders and Commission staff to review SoCalGas' campaign messaging before funds are spent. The Commission modified the proposed decision to provide for oversight and evaluation of the implementation of SoCalGas' proposed campaign.</p>	<ul style="list-style-type: none"> - TURN Comments on the ACR, March 25, 2016, pp. 1-2. - D.16-04-039, p. 19. - TURN Comments on the ACR, March 25, 2016, p. 2. - D.16-04-039, pp. 9 & 29, COL #10. - TURN Comments on PD, April 19, 2016, p. 1. - D.16-04-039, pp. 2, 26 & 29, COL #5. 	<p>Verified.</p>

<p>5. AC Costs & Cost Recovery</p> <p>TURN did not recommend a specific budget for the additional ME&O activities but noted that based on the level of funding for SoCalGas' share of the statewide ME&O program and the budget for the entire Flex Alert program (which include all four of the investor-owned utilities' service territories) \$15 million appeared to be an excessive amount to spend on targeted activities exclusively in the Los Angeles Basin. The Commission agreed and authorized a total budget of \$11 million. TURN also advocated for \$11 million to be a cost cap, which the Commission adopted.</p> <p>TURN made two cost recovery recommendations: 1) order SoCalGas to bear the costs of this intensified program activity, or 2) direct SoCalGas to create a memorandum account to track all such incremental costs so that they may be disallowed in the future, as appropriate, when the Commission addresses Aliso Canyon-related ratemaking issues more globally. Decision 16-04-039 adopted TURN's second proposal and authorized SoCalGas to establish a memorandum account to track all costs and clarified that it was not approving ratepayer funding for the ME&O activities at this time.</p>	<p>- TURN Comments on the ACR, March 25, 2016, p. 2.</p> <p>- D.16-04-039, pp. 11, 18 & 29, COL #3 & 4.</p> <p>- TURN Comments on PD, April 19, 2016, p. 2.</p> <p>- D.16-04-039, p. 30, OP# 2.</p> <p>- TURN Comments on the ACR, March 25, 2016, pp. 4-6.</p> <p>- D.16-04-039, pp. 21 & 29, COL #8.</p>	<p>Verified.</p> <p>TURN Reply Comments on PD, April 19, 2016 at 2.</p>
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified.
c. If so, provide name of other parties: Greenlining Institute; the Center for Accessible Technology, the Office of Ratepayer Advocates (ORA).		Verified.
d. Intervenor's claim of non-duplication: TURN worked diligently to avoid duplication with other like-minded intervenors by avoiding devoting time to issues that were comprehensively addressed by other intervenors. TURN coordinated with other intervenors as appropriate (i.e. when there would be savings in the overall time devoted to the case) but also took positions adverse to ORA and other intervenors on some issues. TURN largely argued for entirely unique positions on other contested issues in the proceeding. Due to the relatively small number of hours that TURN devoted to each issue in the proceeding, and the wide range of contributions attributable to TURN's participation, the Commission should not conclude that any reductions in compensation are warranted based on duplication of effort.		Agreed, TURN did not engage in duplicative participation.

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
TURN's request for intervenor compensation seeks an award of approximately \$12,300 as the reasonable cost of our participation in this portion of the proceeding. In light of the quality of TURN's work, the importance of the issues addressed in this phase of the proceeding, and the magnitude of TURN's substantial contribution to the proceeding and the resulting decisions, the Commission should conclude that the amount requested is reasonable.	Verified.
TURN's advocacy, reflected in D.16-03-029 and D.16-04-039, primarily	

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>addressed policy and process matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot easily identify precise monetary benefits to ratepayers from our work related to D.16-03-029, given the nature of the issues presented. Regarding D.16-04-039, the Commission adopted TURN's recommendation to reduce the overall budget for ME&O activities from \$15,000,000. The Commission determined \$11,000,000 was a more appropriate funding level. The Commission also denied immediate ratepayer funding for the activities and will evaluate the appropriate funding source in a subsequent proceeding pursuant to TURN's recommendation. Given the Commission's reliance in the final decision on TURN's recommendations for determining the appropriate scope and budget for Aliso Canyon outage specific ME&O activities, there should be no dispute that the benefits of TURN's participation far exceed the cost of that participation.</p> <p>While it is difficult to place a dollar value on TURN's contributions to D.16-03-029, TURN submits that our participation should result in substantial benefits in the form of a better and more efficient Statewide ME&O program in 2017 and beyond and more stakeholder participation and oversight of the RFP process. TURN played a critical role as a strong voice for ratepayers throughout the proceeding. Given the Commission's reliance in the final decision on TURN's recommendations for the vision, goals and structure of the 2017 and beyond, there should be no dispute that the benefits of TURN's participation far exceed the cost of that participation.</p> <p>In sum, the Commission should conclude that TURN's overall request is reasonable given the issues at stake in the rulemaking and the adopted outcomes.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>Given TURN's unique contributions to the final resolution of contested issues in these decisions, the amount of time devoted by its staff is fully reasonable. This is a very small request because this is an unusual proceeding that was broken into many phases with limited issues, and it did not require parties to file many pleadings in this phase. TURN did not retain any outside consultants to assist with this case and devoted the minimum number of hours to reviewing rulings, drafting pleadings, reading comments submitted by other parties, and evaluating the proposed decisions. TURN's pleadings were highly substantive given the amount of time devoted to the task.</p> <p>The small number of hours devoted to the range of issues in this case demonstrates the efficiency of TURN's attorney. Moreover, the time devoted to each task was reasonable in light of the complexity of the issues presented. Given the level of success achieved by TURN in this proceeding across a range of issues, the amount of time devoted by staff is fully reasonable.</p> <p><u>Reasonableness of Staffing</u></p> <p>TURN deployed and used its resources for this proceeding in the most reasonable and efficient means possible under the circumstances. TURN devoted one attorney to this proceeding and did not rely on outside consultants for the work related to this request. This attorney only sought advice from a senior attorney</p>	<p>Verified.</p>

<p>familiar with this subject matter on two occasions. TURN's attorney was Elise Torres.</p> <p>Ms. Torres sought advice from Hayley Goodson who is TURN's lead attorney on energy efficiency issues and is very familiar with programs administered under Energy Upgrade California. TURN's decision not to rely on outside consultants for the work claimed in this request reduced the total number of personnel and hours required.</p> <p><u>Compensation Request</u></p> <p>TURN's request also includes 7 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all of our attorney time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p> <p>GP – 18.5 hours – 35% of total</p> <p>General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing Assigned Commissioner Peterman's October 26, 2015, Amended Scoping Memo and Ruling, Commissioner Peterman's March 15, 2016 Ruling regarding Aliso Canyon ME&O and review of the proposed decisions. Also includes review of other parties' filings and discussions with the Center for Sustainable Energy for background information.</p> <p>Coord. – 2.75 hours – 5% of total</p> <p>These include the very limited amount of time TURN spent discussing the proceeding with ORA, Greenlining & Center for Accessible Technology and determining which issues TURN and ORA would each focus on.</p> <p>RFP Process/ Scoring Committee – 3 hours – 6% of total</p> <p>Includes time researching and drafting proposals for the Statewide ME&O RFP Process for the 2017 and beyond program.</p> <p>Goals & Vision – 9.5 hours – 18% of total</p> <p>Includes time researching and drafting proposals for the Statewide ME&O 2017 and beyond revised vision and goals.</p> <p>Structure & Budget – 7 hours – 13% of total</p> <p>Includes time researching and drafting proposals for the Statewide ME&O 2017 and beyond program structure and the proper level of coordination and integration between the statewide and regional programs.</p> <p>Aliso Canyon Costs & Cost Recovery – 8 hours – 15% of total</p> <p>Includes time researching and drafting proposals regarding the appropriate</p>	<p>Verified.</p>

<p>funding level and cost recovery for SoCalGas' additional ME&O activities.</p> <p>Aliso Canyon Scope – 3.5 hours – 7% of total Includes time researching and drafting proposals for the appropriate scope and structure for SoCalGas' additional ME&O activities.</p> <p>COMP – 7 hours Work preparing TURN's notice of intent to claim compensation and the final request for compensation.</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Elise Torres	2015	29.25	\$215	D.16-04-037	\$6,288.75	29.25	\$215	\$6,288.75
Elise Torres	2016	21.75	\$230	Resolution ALJ-329 (1.28% COLA) and see Comment 1	\$5,002.50	21.75	\$230	\$5,002.50
Hayley Goodson	2016	0.75	\$355	D.15-08-023, p. 24 and see Comment 2	\$266.25	0.75	\$355	\$266.25
Subtotal: \$11,557.50						Subtotal: \$11,557.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Elise Torres	2016	7	\$115	@ 50% of \$230	\$805	7	\$115	\$805.00
Subtotal: \$805.00						Subtotal: \$805.00		
COSTS								
#	Item	Detail			Amount	Amount		
1	Copies	Copying of pleadings for ALJ and Commissioner Offices			\$3.80	\$3.80		
2	Postage	Postage for pleadings to CPUC			\$2.62	\$2.62		
Subtotal: \$6.42						Subtotal: \$6.42		
TOTAL REQUEST: \$12,368.92						TOTAL AWARD: \$12,368.92		

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Elise Torres	December 2011	280443	No
Hayley Goodson	December 2003	228535	No

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Cost/expense details
Comment 1	2016 Hourly Rate for Elise Torres For Ms. Torres work in 2016, TURN seeks an hourly rate of \$230, an increase of 6.28% from the previously awarded rate of \$215 for 2015. The increase is the general 1.28% COLA increase provided for in Res. ALJ-329, plus the first of two 5% step increases within the 3-4 year experience tier, authorized in Res. ALJ-329.
Comment 2	2016 Hourly Rate for Hayley Goodson For 2016, TURN is requesting compensation using the rate authorized for 2015. TURN requests that the requested rate NOT be deemed the adopted rate for Ms. Goodson for 2016, as TURN may seek a higher 2016 rate for her work in future requests for compensation.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes.

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>

FINDINGS OF FACT

1. TURN has made a substantial contribution to D.16-04-039 and D.16-03-029.
2. The requested hourly rates for Intervenor's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$12,368.92.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$12,368.92.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, and Southern California Gas Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2015 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning September 7, 2016, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1603029, D1604039		
Proceeding(s):	A1208007, A1208008, A1208009, A1208010,		
Author:	ALJ Roscow		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, and Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	6/24/2016	\$12,368.92	\$12,368.92	N/A	N/A

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Elise	Torres	Attorney	TURN	\$215	2015	\$215
Elise	Torres	Attorney	TURN	\$230/\$115	2016	\$230/\$115

(END OF APPENDIX)